November 3, 2010

Chesapeake Bay TMDL
Phase 1 Watershed Implementation Plan
Public Comment

To Whom It May Concern;

The Dorchester Soil Conservation District has reviewed Maryland's Watershed Implementation Plan (WIP) and would like to make the following comments.

- There are many BMP's and workloads mentioned that are not currently feasible, due to technology and/or staffing. To be successful we need to have the staff trained and available in order to get the practice on the ground. In addition many of the new emerging technologies are not ready for wholesale use yet and seem to be viewed as ready to roll in the language of the WIP.
- The accuracy of the model has been questioned as well as the ability of the model to move with new research and technology. We need to work harder and make sure that we are using the most accurate numbers, based in science and revisit them often.
- Agriculture needs to be responsible for their portion of the clean up, but trading will ultimately weaken the Ag base and should not be used to balance the shortcomings of the other segments involved in the plan.
- Maryland should stick to the federal timetable and not try to meet the goals 5 years earlier than all other Bay states. Especially in this economic climate the extra requirements tied to meeting these TMDL goals, in addition to being accelerated, will negatively impact all segments of Maryland while our partner states are not sharing in the burden equally.

Thank You for your time in reviewing our comments and in closing we would like to stress that all the planning in the world will not produce results if there is not the staff or resources available on the ground to implement the plan.

Sincerely,

Dorchester Soil Conservation District